

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

-----X		
In re	:	
	:	Chapter 13
	:	
Vera D McFarland	:	
	:	Case No. 24-12994 (AMC)
Debtor.	:	
-----X		

**THE CITY OF PHILADELPHIA’S  
OBJECTION TO THE PROPOSED CHAPTER 13 PLAN**

TO THE HONORABLE ASHELY M. CHAN:

AND NOW, comes the City of Philadelphia, (the “City”), a secured creditor in the above-captioned case, by and through its Counsel, Pamela Elchert Thurmond, Senior Attorney, pursuant to Bankruptcy Code §§ 506(b), 1325(a)(5), and L.B.R. 3015-4, to object to the proposed Chapter 13 plan (the “Plan”), of the above-captioned debtor, (the “Debtor”). The City avers the following in support thereof:

1. On August 28, 2024, the Debtor filed a voluntary petition for Chapter 13 bankruptcy with this Court.
2. On August 28, 2024, the Debtor filed a list of all real property owned by the Debtor, which included the property located at 6153 Catherine Street, Philadelphia PA 19143-2205 (the “Subject Property”). A copy of the Debtor Schedule A/B is attached hereto as Exhibit A.
3. The Debtor values the Subject Property at One Hundred Twenty-Four Thousand Dollars (\$124,00.00). See Exhibit A.
4. On December 18, 2024, the City filed a secured claim amounting to Forty Thousand Five Hundred Seventy-Nine Dollars and Seventy-Nine Cents (\$4,579.79) for unpaid water/sewer

debt in connection with (the “Water Claim”) owed by the Debtor to the City for the subject property. A copy of the proof of claim filed by the City is attached hereto as Exhibit B.

5. On August 28, 2024, the Debtor filed the Plan, which provides for a total payment in the amount of Five Hundred Dollars (\$500.00). However, the city filed a secured “Water Claim” amounting to (\$4,579.79) as detailed in paragraph 4. A copy of the Plan is attached hereto as Exhibit C.

6. As neither the Debtor nor another party in interest has objected to the Water Claim, it is deemed allowed. See 11 U.S.C. § 502(a).

7. The Plan should not be confirmed as it fails to adequately specify the correct payment for the Water Claim. See 11 U.S.C. §§ 506(b), 1325(a)(5)(B)(ii).

WHEREFORE, the City respectfully requests that this Court DENY confirmation of the Plan.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: January 23, 2025

By: /s/ Pamela Elchert Thurmond  
PAMELA ELCHERT THURMOND  
Senior Attorney  
PA Attorney I.D. 202054  
Attorney for the City of Philadelphia  
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**CERTIFICATE OF SERVICE**

I, Pamela Elchert Thurmond hereby certify that on January 23, 2025, a copy of the Objection to the Purposed Chapter 13 Plan was served on the following parties by Court-generated ECF notice, and/or first-class mail, postage prepaid, as indicated below:

Via ECF Filing

Chapter 13 Trustee:  
KENNETH E. WEST  
Office of the Chapter 13 Standing Trustee  
190 N. Independence Mall West – Suite 701  
Philadelphia, PA 19106

United States Trustee  
Office of United States Trustee  
Robert N.C. Nix Federal Building  
900 Market Street – Suite 320  
Philadelphia, PA 19107

BRAD J. SADEK  
Sadek Law Offices, LLC  
1500 JFK Boulevard – Ste 220  
Philadelphia, PA 19102

Via USPS Mail Delivery

Vera D McFarland  
6153 Catharine Street  
Philadelphia, PA 19143

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: January 23, 2025

By: /s/ Pamela Elchert Thurmond  
PAMELA ELCHERT THURMOND  
Senior Attorney  
PA Attorney I.D. 202054